

EXHIBIT A

From: [Steinberg, Joachim](#)
To: [Barsanti, Vanessa](#); [Ginder, Cameron](#)
Cc: [ROSS-AT Team](#); [#Thomson-Ross](#)
Subject: RE: D.Del. 1:20-cv-00613-LPS Thomson Reuters Enterprise Centre GmbH et al v. ROSS
Date: Monday, May 15, 2023 7:39:25 AM

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Be cautious, particularly with links and attachments.

Vanessa,

ROSS believes that the production is still deficient. In addition to missing the substantial completion deadline, failing to identify appropriate custodians, and producing documents so that ROSS could not use them with fact witnesses, we also believe there may still be gaps in the production, including agreements identified within your interrogatory responses. While we are working to determine that as quickly as possible, given the schedule, and the Court's statement that we could renew our request, we intend to raise this with the Court immediately.

Best,
Joachim

Joachim B. Steinberg

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From: Barsanti, Vanessa <vanessa.barsanti@kirkland.com>
Sent: Friday, May 12, 2023 3:02 PM
To: Steinberg, Joachim <JSteinberg@crowell.com>; Ginder, Cameron <cameron.ginder@kirkland.com>
Cc: ROSS-AT Team <ROSS-ATTeam@crowell.com>; #Thomson-Ross <thomson-ross@kirkland.com>
Subject: RE: D.Del. 1:20-cv-00613-LPS Thomson Reuters Enterprise Centre GmbH et al v. ROSS

External Email

Joachim,

How did Thomson Reuters fail to produce documents in time? It produced all the documents it said it would on May 11, as it told the Court and as the Court found acceptable.

Vanessa Barsanti

She/Her/Hers

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From: Steinberg, Joachim <JSteinberg@crowell.com>
Sent: Friday, May 12, 2023 2:58 PM
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Subject: D.Del. 1:20-cv-00613-LPS Thomson Reuters Enterprise Centre GmbH et al v. ROSS

Vanessa and Cameron,

ROSS intends to ask the Court to extend the expert discovery schedule by 30 days and to extend all dates by 30 days, pursuant to the Court's May 1 order permitting ROSS to renew its request at the close of fact discovery, because Plaintiffs failed to produce documents in time. Will you stipulate to that extension? Otherwise we will file our letter brief with the Court.

Best regards,
Joachim

Joachim B. Steinberg

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